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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORLAND DIVISION**

**UNITED STATES OF AMERICA** **3:18-CR-00145-SI**  
**v.** **MOTION TO UNSEAL**  
**JAMES KEENAN,** **UNDER SEAL**  
**Defendant.**

The United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and through Scott M. Kerin, Assistant United States Attorney, hereby moves this Court for an order unsealing the above referenced criminal case, arrest warrant, and indictment.

On April 5, 2018, the grand jury returned a sealed indictment charging the defendant with sex trafficking of a child, in violation of 18 U.S.C. §§1591(a)(1), 1591(b)(2), and 1591(c); attempted sex trafficking of a child, in violation of 18 U.S.C. §§1591(a)(1), 1591(b)(2), and 1591(c); and, attempted enticement, in violation of 18 U.S.C. §2422(b). A warrant for the

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defendant's arrest was also issued by the Court.

In trying to serve the arrest warrant, the case agent has learned that the defendant appears to have fled the area. The defendant was interviewed about the allegations approximately two weeks prior to the case being presented to the grand jury. After the arrest warrant was issued, the case agent learned that on March 30, 2018, without prior notice, the defendant showed up to work and told his employer he was leaving and going back to New York. The case agent has also observed that the defendant appears to have left his residence, and his vehicle has not been able to be located. At this time, the case agent believes the defendant has left the area and is a fugitive. The case agent wishes to put out a public fugitive alert on the defendant in an effort to assist in his apprehension.

The government hereby asks the Court to unseal the criminal case, arrest warrant, and indictment, as well as this motion and the proposed order, so that law enforcement can pursue a public fugitive alert to assist in the apprehension of the defendant. The government does not know of any need to keep the materials under seal at this point.

DATED this 10<sup>th</sup> day of April 2018.

Respectfully submitted,

BILLY J. WILLIAMS  
United States Attorney

  
SCOTT M. KERIN  
Assistant United States Attorney